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Attorneys for Non-Parties  
SANDSTONE GROUP, LLC,  
TYTO LIDAR, LLC, and  
OGNEN STOJANOVSKI

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

WAYMO LLC

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ADRIAN J. SAWYER  
IN SUPPORT OF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS LETTER BRIEF IN  
SUPPORT OF ITS MOTION TO COMPEL  
FORENSIC IMAGES AND OTHER  
MATERIALS PROVIDED BY THE  
DILIGENCED EMPLOYEES TO STROZ  
FRIEDBERG (DKT. 1784)**

1 I, Adrian J. Sawyer, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of California. I  
3 am a partner in the law firm of Kerr & Wagstaffe LLP, attorneys for non-parties Sandstone  
4 Group, LLC, Tyto LiDAR, LLC, and Ognen Stojanovski. I have personal knowledge of the  
5 matters stated herein and if called upon would testify competently thereto.

6 2. I make this declaration in support of Plaintiff Waymo LLC's Administrative  
7 Motion to File Under Seal Its Letter Brief in Support of Its Motion to Compel Forensic Images  
8 and Other Materials Provided by the Diligenced Employees to Stroz Friedberg (Dkt. 1784). I  
9 have reviewed the Administrative Motion to File Under Seal (the "Administrative Motion"),  
10 together with Waymo's Letter Brief in Support of Its Motion to Compel Forensic Images and  
11 Other Materials Provided by the Diligenced Employees to Stroz Friedberg ("Letter Brief") (Dkt.  
12 1784-6), and the exhibit to the Letter Brief sought to be filed under seal.

13 3. Tyto LiDAR and Sandstone Group are non-parties and are existing limited  
14 liability companies. All of the information designated by Tyto LiDAR or Sandstone Group and  
15 included in the Letter Brief was designated confidential. None of the information was  
16 designated highly confidential/AEO by Tyto LiDAR or Sandstone Group.

17 4. Exhibit 2 to the Letter Brief contains terms that reflect confidential ownership  
18 information of Sandstone Group and Tyto LiDAR. Because Sandstone Group and Tyto LiDAR  
19 are non-parties and existing private companies, they request that their confidentiality interests in  
20 this ownership information be respected in this proceeding.

21 5. Waymo's request to seal is narrowly tailored to those exhibits to Waymo's  
22 Response that merit sealing.

23 I declare under penalty of perjury under the laws of the United States of America that the  
24 foregoing is true and correct. Executed this 28th day of September, 2017 at San Francisco,  
25 California.

26  
27 /s/ Adrian J. Sawyer  
28 ADRIAN J. SAWYER